

SUBJECT: HAZARD COMMUNICATION PROGRAM

DATE: NOVEMBER 15, 1999

Program

I. INTRODUCTION

On November 25, 1983, the Occupational Safety and Health Administration (OSHA) issued the Hazard Communication Standard, 29CFR 1910.1200, commonly known as the Employee Right to Know Law. This Department of Labor standard originally was aimed towards protecting manufacturing workers from injuries and illnesses due to chemical exposures. It established specific requirements for manufacturing employers to provide information and training to affected employees about the hazardous materials they may encounter in the workplace. Beginning May 23, 1988, the Hazard Communication Standard applied to an expanded scope of employees, including government entities.

II. PURPOSE

The Office of General Services which is an arm of the South Carolina Budget and Control Board includes some operations that use chemical substances which can be harmful unless precautions are taken. This written Hazard Communication Program is intended to serve as a guideline for all units in developing an adequate means of informing and protecting employees and complying with regulatory requirements. Its goal is to ensure protection of all employees involved in the handling and use of hazardous chemicals.

The effectiveness of this program depends upon the sincere support and cooperation of all involved.

III. POLICY STATEMENT

All Office of General Services employees exposed to hazardous materials shall be trained as outlined in this Hazard Communication program. It shall be the policy of OGS to maintain awareness of all hazardous materials encountered by its employees and to communicate any associated hazards along with the necessary safety precautions.

Also, all visitors to Office of General Services facilities and job sites shall comply with the program or shall be denied access to these areas.

IV. PRINCIPAL REQUIREMENTS OF THE HAZARD COMMUNICATION STANDARD

- A. Ensure that each container of hazardous materials in the workplace is labeled, tagged or marked with the identity of the chemical and appropriate hazard warning.
- B. Maintain copies of Material Safety Data Sheets (MSDS's) for each hazardous material in the workplace, and ensure that the MSDS's are readily accessible to employees.
- C. Provide employees with specific information regarding hazardous materials in their work area at the time of their initial assignment and whenever a new hazard is introduced into their work area. Employees must be informed of (1) the requirements of the HCS, (2) any operations in their work area where hazardous materials are present, and (3) the location and availability of the written hazard communication program and the MSDS's.
- D. The training must include at least: (1) methods and observations that may be used to detect the presence of a hazardous material in the work area, (2) the physical and health hazards of the hazardous material in the work area, (3) the measures employees can take to protect themselves from those hazards, and (4) the details of the Office of General Services' Hazard Communication Program, including an explanation of the MSDS's, the labeling system, and the methods for employees to obtain and use the appropriate hazard information. This training is given to employees on the first day of work at the New Employee Safety Orientation.
- E. Develop, implement and maintain at the workplace a written hazard communication program, which must include at least the following items: (1) a description of how the requirements in (A), (B), (C), and (D) above will be met, and (3) a description of the methods that will be used to inform employees of the hazards of non-routine tasks.

V. CHEMICALS EXEMPTED FROM THE HAZARD COMMUNICATION STANDARD

- A. Any food, food additive, color additive, drug, or cosmetic, including materials intended for use as ingredients in such products (e.g. flavors

and fragrances), as such terms are defined in the Federal Food, Drug and Cosmetic Act (21 U. S. C. 301 et seq.) and regulation issued under that Act, when they are subject to the labeling requirement of that Act and labeling regulations issued under that Act by the Food and Drug Administration.

- B. Any distilled spirits (beverage alcohol), wine, or malt beverage intended for non-industrial use, as such terms are defined in the Federal Alcohol Administration Act (21 U.S. C. 201 et. seq.) and regulations issued under that Act, when subject to the labeling requirements of that Act by the Bureau of Alcohol, Tobacco, and Firearms.
- C. Any consumer product or hazardous substances as those terms are defined in the Consumer Product Safety Act (15 U.S.C. 1261 et. seq.) respectively, when subject to consumer product safety standard or labeling requirements of those Acts, or regulations issued under those Acts by the Consumer Product Safety Commission.
- D. Any hazardous waste as such term is defined by the Solid Waste Disposal Act, as amended by the Resource Commission and Recovery Act of 1976, as amended U. S. C. 6901 et. seq.), when subject to regulations issued under that Act by the Environmental Protection Agency.
- E. Tobacco or tobacco products;
- F. Wood or wood products;
- G. Articles which do not release, or otherwise result in exposure to, a hazardous material under normal condition of use; and
- H. Foods, drugs, or cosmetics intended for personal consumption or use by employees while in the workplace.

VI. MATERIAL SAFETY DATA SHEETS (MSDS)

A. Obtaining MSDS's:

A Material Safety Data Sheet is required for each hazardous material on the workplace list. The Office of General Services Supply Warehouse will provide a Material Safety Data Sheet for each hazardous material provided to a customer. For products received directly from manufacturers or distributors, employees shall obtain MSD sheets from those sources.

Teams shall document their efforts to obtain MSD sheets from

suppliers. No hazardous material or products may be brought into the OGS workplace unless the MSD sheet is present. A process for this work shall be found in each Team's processes. Once a new MSD sheet is obtained, a copy of the sheet shall be forwarded to the Safety Support Office by transmittal. New MSD sheets may be obtained by employees through the OGS Safety Website, located at: <http://www.ogs.state.sc.us/business/safety/OGS-safety-index.html>

B. Maintaining MSDS's:

Material Safety Data Sheets, a copy of the written Hazard Communication Program and all hazardous materials in the workplace are to be maintained in a notebook at each permanent workplace at a location convenient and readily accessible to all OGS employees, during all shifts. Certain mobile operations, such as herbicide crews or other special crews, which have an increased exposure to hazardous materials should keep copies of MSDS's available with their trucks at job sites. Any MSD sheet which represents a discontinued hazardous material or product shall be maintained in the Safety Support office in a file for a period of 30 years.

The MSDS Books should follow a standardized format. The Safety Committee recommends that teams follow an "Alpha-numeric" format for the organization of their MSDS Books. If the Team format is organized in some way other than a Alpha-numeric format, Teams may set up their format any way that works for their team with the idea in mind that they will ultimately transfer the list of chemicals to a centralized data base that is accessible by all the teams.

C. Updating MSDS's:

Incoming Material Safety Data Sheets shall be reviewed by Supervisors or their designees, and copies of updated MSDS's shall be forwarded to affected units. If the Material Safety Data Sheet which is brought into the workplace with new products has not been revised, the new MSDS may be discarded. If the MSDS has been revised, the MSDS must be placed in the file and the old MSDS removed. A copy of the old and new MSD sheet shall be forwarded to the Safety Support Office by transmittal, along with an updated index. The date of removal shall be written on the old MSDS and it shall be placed in a file labeled "Old Material Safety Data Sheets" and housed in the Safety Support Office.

Old Material Safety Data Sheets shall be maintained for thirty (30) years past the duration of the exposed employees' employment.

VII. CONTAINER LABELING

A. Incoming Containers:

Under the standard, chemical manufacturers and suppliers are responsible for labeling containers of hazardous chemicals. It is the responsibility of the Supervisor or his designee, in each unit to ensure that each container arriving at a facility is labeled or marked legibly with the following information:

1. Identity (can be any chemical or common name for the agent as long as the term used is the same shown in the Department's list of hazardous materials and the Material Safety Data Sheet).
2. Appropriate Hazard Warnings.
3. Name and address of the Chemical Manufacturer, supplier or other responsible party.

B. Workplace Containers:

Hazardous chemicals which are dispensed from the original shipping container must be dispensed into the appropriate containers with the chemical identity and the hazard warning affixed. Any further dispensing likewise must be into similarly labeled containers ultimately to the point of final use.

Exceptions:

1. Chemicals to be used exclusively by one employee during one work shift may be transferred to and used from unlabeled containers. However, if the employee leaves the chemical unattended at any time, (for example, to take a break, answer a telephone call, or go to lunch), then the chemical container must be labeled.
2. Laboratory chemicals dispensed from a properly labeled incoming container shall be identified by name only when dispensed for use in the laboratory.

C. Updating of Labels:

If an OGS Team is notified of significant hazard characteristic changes on an updated MSDS, the Supervisor, or his designee, responsible for container labeling shall see that any outdated

hazard warnings on labels are corrected to convey the updated information.

VIII. NON-ROUTINE TASKS

- A. Circumstances may require employees to perform tasks that involve potential exposure to hazardous chemicals which are not in the course of the regular job.

Prior to these tasks, employees shall be notified regarding:

- 1. The nature of any hazardous materials present. Material Safety Data Sheets for those materials shall be reviewed in detail and all recommendations followed in preparing for the task.
- 2. Precautionary measures and protective equipment needed for the task.
- 3. Any hazards associated with hazardous materials present in unlabeled pipes, such as refrigeration ammonia and propane in distribution systems.

- B. When in doubt, contact the Safety Support Unit in Business Services (737-2311) or an expert within the field of operations before proceeding with an unfamiliar task which may endanger an employee.

IX. NON-DEPARTMENTAL PERSONNEL (contractors, etc.)

- A. Mutual conveyance of hazardous materials information is necessary between the Office of General Services and outside contractors and service personnel.
 - 1. The Office of General Services must be informed of all hazardous materials to be brought into the workplace by contractors and / or service personnel.
 - 2. Contractors and / or service personnel must be informed of all hazardous materials they may encounter during their activities in the Office of General Services' workplace.
- B. It is the responsibility of the Office of General Services to inform its employees and provide any necessary training to deal with hazardous materials brought into the workplace. Likewise, it is a responsibility of the Office of General Services to provide contractors and / or service personnel adequate information on hazardous materials within the workplace, so that contractors may inform and provide their employees with any training necessary.

In dealing with contractors, the following information shall be exchanged:

1. A list of hazardous materials to which they may be exposed while on the job site;
2. Precautions that employees may take to lessen the possibility of exposure;
3. The location of Material Safety Data Sheets (which must be immediately available).

X. EMPLOYEE TRAINING

- A. All Office of General Services employees are required to receive initial Hazard Communication training. Employees who are or may be exposed to hazardous materials in the workplace shall receive additional training on hazardous materials (not necessarily each chemical). New employees shall be trained as soon as possible after hiring and before they are assigned to work with hazardous materials.
- B. Initial Hazard Communication training will be conducted in the New Employee Safety Orientation by the staff of Safety Support. The initial training shall consist of a brief discussion of all sections of this Hazard Communication Program. The following points will be covered in the training:

Material Safety Data Sheets: Training Information

Material Safety Data Sheets are provided by the chemical manufacturer to provide additional information concerning safe use of the product. Each MSDS provides:

- Common Name and Chemical Name of the material
- Name, address and phone number of the manufacturer
- Emergency phone numbers for immediate hazard information
- Date the MSDS was last up-dated
- Listing of hazardous ingredients
- Chemical hazards of the material
- Information for identification of chemical and physical properties

Information on MSDS that chemical users must know

Fire and/or Explosion Information

- Material Flash Point, auto-ignition temperature and upper/lower flammable limits
- Proper fire extinguishing agents to be used

- Fire fighting techniques
- Any unusual fire or explosive hazards

Chemical Reaction Information

- Stability of Chemicals
- Conditions and other materials which can cause reactions with the chemical
- Dangerous substances that can be produced when the chemical reacts

Control Measures

- Engineering Controls required for safe product use
- Personal protective equipment required for use of product
- Safe storage requirements and guidelines
- Safe handling procedures

Chemical Health Hazards

1. Permissible Exposure Limit (PEL) and Threshold Limit Value (TLV)
2. Acute or Chronic symptoms of exposure
3. Main routes of entry into the body
4. Medical conditions that can be made worse by exposure
5. Cancer causing properties if any
6. Emergency and First Aid treatments

Spill and Leak Procedures

- Clean up techniques
- Personal Protective Equipment to be used during cleanup
- Disposal of waste & cleanup material

Employee use of MSDS

For MSDS use to be effective, employees must:

- Know the location of the MSDS
 - Understand the major points for each chemical
 - Check MSDS when more information is needed or questions arise
 - Be able to quickly locate the emergency information on the MSDS
- A. Follow the safety practices provided on the MSDS

- B. Additional training shall be conducted by Supervisors on specific hazardous materials of each workplace and when a new hazard, not necessarily a new chemical, is introduced into the work area.
- C. Documented records of training shall be maintained in the Safety Support Office and shall include:
 - 1. A copy of the Hazard Communication Program.
 - 2. A description of the training (class outline) used.
 - 3. The date training was completed.
 - 4. All employees completing the Hazard Communication Training Program shall sign a Training Roster Form.
- E. Follow-up shall be conducted by Supervisors to insure that affected employees remain aware of the Hazard Communication Standard and its requirements, that they can demonstrate where Material Safety Data Sheets are located and that they are generally familiar with the hazardous properties of the hazardous materials in their work area and the protective measures being implemented.